

**EXHIBIT 7**  
**FILED UNDER SEAL**

## James Judah

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**From:** James Judah  
**Sent:** Friday, August 04, 2017 10:13 PM  
**To:** 'John Cooper'; Matthew Cate; mhaag@orrick.com; Brown, Walter F.; UberWaymoMoFoAttorneys; 'BSF\_EXTERNAL\_UberWaymoLit@bsfllp.com' (BSF\_EXTERNAL\_UberWaymoLit@bsfllp.com); DG-GPOttoTruckingWaymo@goodwinlaw.com  
**Cc:** QE-Waymo  
**Subject:** Waymo v Uber - Discovery Correspondence

John and Counsel –

We'd like to schedule a meet and confer call for Monday to set up a briefing schedule for Waymo's Motion to Compel Travis Kalanick's text messages, phone, and/or forensic image of same. To date, Uber has produced approximately 130 text messages sent by Mr. Kalanick to Mr. Levandowski, and approximately 400 sent by Mr. Levandowski to Mr. Kalanick. Uber does not appear to have produced a single text message from Mr. Kalanick to Mr. Levandowski before March 1, 2016, and only a single text message from Mr. Kalanick to Mr. Levandowski before April 5, 2016. Uber has not produced a single text message from Mr. Levandowski to Mr. Kalanick before February 13, 2016. Uber has provided essentially no information about what efforts, if any, have been made to collect, search for, and produce this highly relevant discovery, and when such efforts actually began. We understand that the information discussed by the experts on today's call between Waymo's expert and Orrick's expert is not admissible or usable in any briefing to compel this discovery. If there is any admissible information about Mr. Kalanick's phone and efforts to collect responsive information from it that Uber and/or Mr. Kalanick would like to provide in advance of Waymo's Motion, then please provide it in writing before Monday. As you know, Uber has been under a Court Order to provide these text messages since May 11. Waymo cannot wait any longer to ask for the Court's assistance in obtaining this discovery.

Best,  
James

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